

3-30-12

Clerk, U. S. District Court

Western District of Texas

By

744

Deputy

**UNITED STATES DISTRICT COURT**  
for the  
**Western District of Texas**

United States of America )  
v. )  
CHRISTOPHER FLORES ) Case No. 5:12-MJ-338  
)  
)  
)

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 29, 2012 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:

*Code Section*

21 U.S.C. 841(a)(1) and 841(b)(1)  
(B)

*Offense Description*

Possession with Intent to Distribute a controlled substance, which offense involved 100 Kilograms or more of Marijuana.

**PENALTIES:** 5 to 40 years imprisonment, \$5 million fine, 4-5 years supervised release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.



Complainant's signature

SAPD/DARRON PHILLIPS

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/30/2012

City and state: San Antonio, Texas



Judge's signature

JOHN W. PRIMO, US MAGISTRATE JUDGE

Printed name and title

10 years confinement, \$250,000 Fine or both; 3 years supervised release; \$100 mandatory special assessment

AFFIDAVIT IN SUPPORT OF COMPLAINT

1. I, DARRON PHILLIPS, am a Detective with the San Antonio Police Department (SAPD). The following is based on information provided to me by the individuals more fully identified below and from my own personal observations:

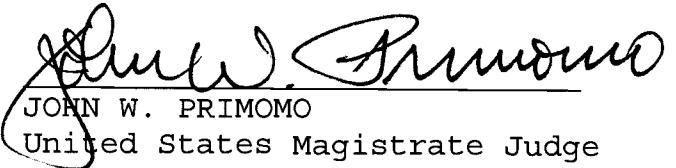
2. I received information from a proven and credible source of information (CS) that an individual known as CHRISTOPHER FLORES would be using his motor vehicle to pick up a quantity of controlled substances on the evening of March 29, 2012 at an unknown location in the City of San Antonio. On the evening of March 29, 2012, SAPD narcotics officers followed FLORES who was driving a Toyota Tundra pickup from FLORES'S residence in the City of San Antonio, Texas to a location on the south side of San Antonio. FLORES was observed to meet another individual at this location. After FLORES and his Toyota departed this location, an SAPD patrol unit conducted a traffic stop of FLORES'S vehicle. Once FLORES'S Toyota was stopped, the SAPD patrol officer observed in plain view that the bed of the Toyota contained several bundles. These bundles appeared consistent with the manner in which marijuana is packaged. During a search of the Toyota, several bundles containing marijuana were seized. The bundles with marijuana had a cumulative gross weight of

approximately 547 pounds. I know from my experience and training that this quantity of marijuana is consistent with and evidences the intent to distribute. After FLORES was arrested, I procured a search warrant for FLORES'S residence at 18742 Calle Cierra, San Antonio, Texas. During the search of the residence, SAPD officers found and seized approximately 100 pounds of marijuana and approximately 408 grams of cocaine.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
DARRON PHILLIPS, SAPD

Sworn to before me on March 30, 2012.

  
\_\_\_\_\_  
JOHN W. PRIMOMO  
United States Magistrate Judge